

MELINDA HAAG (CABN 132612)
United States Attorney
J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division
THOMAS MOORE (ALBN 4305-078T)
Assistant United States Attorney
Chief, Tax Division
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7017
FAX: (415) 436-7009

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 14-0021 JST
)	
Plaintiff,)	STIPULATION TO RESCHEDULE CHANGE OF
)	PLEA HEARING AND TO EXCLUDE TIME
v.)	UNDER SPEEDY TRIAL ACT AND PROPOSED
)	<u>ORDER THEREON</u>
CHARLES S. MOORE,)	
)	
Defendant.)	

For the reason that Defendant Charles S. Moore needs additional time for effective preparation, continuity of counsel, trial preparation, and to consider the government's proposed plea agreement, the United States of America, and Defendant, through their respective counsel, hereby stipulate as follows:

1. That the change of plea hearing in this matter be rescheduled from January 2, 2015, to January 16, 2015, at 9:30 a.m., to allow Defendant sufficient time to prepare this matter for trial and to consider the proposed plea agreement.

2. That the period of delay from January 2, 2015, to January 16, 2015, be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends for justice served by this exclusion allow for effective preparation, continuity of counsel and adequate trial preparation, which outweigh the best interests of the public and Defendant in a speedy trial.

//

Respectfully submitted,

MELINDA HAAG
United States Attorney

/s/

JOYCE LEAVITT
Assistant Public Defender

/s/

THOMAS MOORE
Assistant United States Attorney
Chief, Tax Division

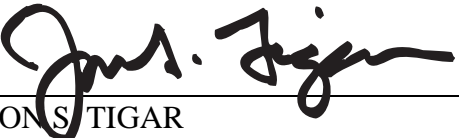
ORDER

For the reasons stated by the parties in their stipulation, the Court finds that the ends of justice are served by continuing the change of plea hearing to allow Defendant additional time for effective preparation, continuity of counsel, trial preparation, and to consider the proposed plea agreement. The Court also finds that the period of delay from January 2, 2015, to January 16, 2015, be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§3161(h)(7)(A) and (h)(7)(B)(iv), as the ends for justice served by this exclusion allow for effective preparation, continuity of counsel and adequate trial preparation, which outweigh the best interests of the public and Defendant in a speedy trial.

IT IS HEREBY ORDERED that the change of plea hearing scheduled for January 2, 2015, be rescheduled to January 16, 2015, at 9:30 a.m. and that the period of delay from January 2, 2015, through January 16, 2015, shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends of justice served by this continuance allow for effective preparation, continuity of counsel, and adequate preparation, which outweigh the best interests of the public and Defendant in a speedy trial.

IT IS SO ORDERED this 31st day of December, 2014.

Dated: December 31, 2014



JON S. TIGAR
UNITED STATES DISTRICT JUDGE